

Christine Y. Wong, Bar No. 284026
ChristineWong@mofo.com
Morrison & Foerster LLP
425 Market Street
San Francisco, California 94105-2482
Telephone: 415.268.7000
Facsimile: 415.268.7522
Attorney for Gary Szukalski

Ted W. Cassman, Bar No. 98932
Raphael M. Goldman, Bar No. 229261
goldman@achlaw.com
cassman@achlaw.com
Arguedas, Cassman, Headley & Goldman LLP
803 Hearst Avenue
Berkeley, CA 94710
Telephone: (510) 845-3000
Facsimile: (510) 845-3003
Attorneys for Nicole Eagan

Thomas H. Bienert, Jr., Bar No. 135311
Sandra Lechman, Bar No. 288660
tbienert@bklwlaw.com
slechman@bklwlaw.com
Bienert Katzman Littrell Williams LLP
CalEdison Building
601 W. 5th Street, Suite 720
Los Angeles, CA 90071
Telephone: (213) 528-3400
Facsimile: (949) 369-3701
Attorneys for Rob Sass

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN,

Defendants.

Case No. 3:18-cr-577-CRB

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO RULE 17
SUBPOENAS**

Pursuant to Federal Rule of Criminal Procedure 45(b), Gary Szukalski, Rob Sass, and
Nicole Eagan respectfully submit this stipulation for a second sixty (60) day extension of time in

STIPULATION FOR EXTENSION OF TIME TO RESPOND TO
RULE 17 SUBPOENAS Case No. 3:18-cr-577-CRB

1 which to produce documents requested by counsel for the United States in the above captioned
2 matter.

3 On June 8, 2022, this Court issued Rule 17 Subpoenas to Testify and Produce Documents
4 or Objects in a Criminal Case (the “Subpoenas”) to each of Gary Szukalski, Rob Sass, and Nicole
5 Eagan (the “Subpoena Recipients”). The original deadline to provide responsive documents was
6 October 5, 2022. On October 5, 2022, the Court extended the original deadline to December 5,
7 2022. If the Court grants this stipulation, the response will instead be due Friday, February 3,
8 2023.

9 Counsel for the Subpoena Recipients informed counsel for the United States of their
10 intention to seek this extension. The United States does not oppose and joins in this stipulation.
11 In support of this stipulation, the Subpoena Recipients state the following:

12 1. There is good cause to grant this stipulation. While reserving all rights regarding
13 objections to the subpoena, the Subpoena Recipients are engaged in discussions with the United
14 States regarding the scope of documents sought by the Subpoenas.

15 2. In the interest of judicial efficiency and to allow time for these discussions to continue,
16 the Subpoena Recipients request that this Court allow a 60 day extension of time in which to
17 produce documents.

18 3. The United States has consented to the requested extension and would not be
19 prejudiced if it were granted. Moreover, given that this matter is not yet set for trial, the
20 extension sought will not delay the Court’s proceedings.

21 5. For the foregoing reasons, the Subpoena Recipients respectfully request that, in
22 accordance with this stipulation, the time in which they may produce documents responsive to the
23 Subpoenas be extended by sixty days, to and including February 3, 2023.

1 Dated: November 28, 2022

MORRISON & FOERSTER LLP

2
3 By: /s/ Christine Y. Wong
4 Christine Y. Wong

5 Attorney for Gary Szukalski

6 Dated: November 28, 2022

7
8 By: /s/ Ted W. Cassman
9 Ted W. Cassman

10 Attorney for Nicole Eagan

11 Dated: November 28, 2022

12 By: /s/ Stephen James Binhak
13 Stephen James Binhak

14 Attorney for Rob Sass (admitted pro hac vice)

15 Dated: November 28, 2022

16 By: /s/ Adam A. Reeves
17 Adam A. Reeves

18 Assistant United States Attorney